

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

CELLCO PARTNERSHIP D/B/A VERIZON  
WIRELESS AND VERIZON CORPORATE  
SERVICES GROUP INC.,

Defendants.

Case No. 2:23-CV-00352-JRG-RSP

**JURY TRIAL DEMANDED**

**JOINT MOTION TO AMEND DOCKET CONTROL ORDER**

Plaintiff Headwater Research LLC (“Headwater”) and Defendants Cellco Partnership d/b/a Verizon Wireless and Verizon Corporate Services Group Inc. (“Verizon”), (collectively, the “Parties”) respectfully file this Joint Motion to Amend the Docket Control Order and would show the Court as follows:

The current deadline for the Parties to file the Joint Pretrial Order, Joint Proposed Jury Instructions, Joint Proposed Verdict Form, Updated Exhibit Lists, Updated Witness Lists, and Updated Deposition Designations is May 12, 2025. The Parties respectfully request a brief extension of the deadline to file the these papers to May 14, 2025, to allow additional time for the Parties to narrow disputes in advance of the Pretrial Conference, which is currently set for May 19, 2025. No other deadlines will be affected by these amendments.

The Parties represent that this Motion is not filed for the purposes of delay but rather so that justice may be served. The Parties have met and conferred and are jointly seeking the relief sought in this Motion.

Accordingly, the Parties respectfully request that the Court grant this Joint Motion to Amend the Docket Control Order (Dkt. No. 131) as follows:

Original Date	Amended Date	Event
May 19, 2025		*Pretrial Conference – 9:00 a.m. in <b>Marshall, Texas</b> before Judge Roy Payne
May 12, 2025	May 14, 2025	*Notify Court of Agreements Reached During Meet and Confer  The parties are ordered to meet and confer on any outstanding objections or motions <i>in limine</i> . The parties shall advise the Court of any agreements reached no later than 1:00 p.m. three (3) business days before the pretrial conference.
May 12, 2025	May 14, 2025	*File Joint Pretrial Order, Joint Proposed Jury Instructions, Joint Proposed Verdict Form, Updated Exhibit Lists, Updated Witness Lists, and Updated Deposition Designations
May 12, 2025		Responses to <i>Motions in Limine</i>

Dated: May 12, 2025

Respectfully submitted,

By: /s/ Marc Fenster

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*and Verizon Corporate Services Group Inc.*

**CERTIFICATE OF CONFERENCE**

Counsel for Plaintiff and counsel for Defendants have complied with the meet and confer requirements of Local Rule CV-7(h). The parties are in agreement on filing this Joint Motion.

*/s/ Marc Fenster*  
Marc Fenster

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic services are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on May 12, 2025.

*/s/ Marc Fenster*  
Marc Fenster